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WORK PLAN ADDENDUM #01

For
"Lottastuff"
2040 Williams Street
San Leandro, California

Prepared For:

EPA Region 9
Superfund Division, SFD-9
75 Hawthorne Street
San Francisco, CA 94105

Prepared By:

Morgan Environmental Services, Incorporated
1233 21ST Street
Oakland, CA 94607

INTRODUCTION:

This ADDENDUM #01 has been prepared in response to comments returned by EPA Representatives with regard to "Work and Site Operations Plan" prepared by Morgan Environmental Services, Incorporated (MESI) for the "Lottastuff" site located at 2040 Williams Street, San Leandro, California. Correspondence within this addendum has been derived from discussions and operational decisions based on the best available data and requests by Client, Legal Advisors, and EPA representatives.

1.0 Commodity vs. Waste Determination and Designation:

All sections of the site will be characterized according to applicable waste regulation and compliance criteria. Additional considerations for waste vs. commodity will include expiration dates and related product information conveyed in the EPA's Unilateral Administrative Order (UAO) paragraph 19, section A. Marketability and Feasible Applications of the materials will be based on the Client's ability to provide information on resale capabilities and probabilities of success therein including potential customer bases.

2.0 Site Description and Potential Waste Locations:

The twelve areas identified in the "Work Plan" were referenced in order to provide grid reference designations from which a plan of approach and egress could be employed. The coordinates for these locations were included in "site description" page 3 & 4 of the work plan under the "Grid Reference" heading. These coordinates correspond to site diagrams identifying post and wall markers within the structure from which operational zones will be based and designated. An additional copy of the site diagram is being provided with this addendum. Areas leased by tenants of Mr. Chapman will be verified by the property management staff prior to operations during site orientation.

3.0 Air Quality Screening Plan:

Continuous air monitoring will be performed in work zones where potential atmospheric changes may occur including during the management of liquid commodities or wastes, solids with volatile contents, or unknown materials which are subject to investigative activities. Various air monitoring equipment may be applied in preparation for the handling of these materials. This equipment will assist in maintaining compliance with air quality standards for PEL's and TWA exposure limits.

4.0 Operational Approach Issues:

1. Areas to serve as temporary storage include Parking lot slots that Mr. Chapman's personnel have indicated will be made available near the East roll-up door next to the administrative offices. The area is free of through traffic, easy to secure, has access to a fire hydrant, and provides a natural containment utilizing the elevated

foundations of the building. Storm water grates can be diverted, blocked or temporarily sealed during the short term storage. For materials or packaging sensitive to water or direct sunlight, space has been designated within the main warehouse inside of the East roll-up door entry way. Small shelving will be relocated to accommodate the storage.

2. A small area adjacent to the "washing machine" outside of the building equipped with bench work, running water, and overhead canopy will be utilized to perform hazardous characterization, sample preparations, and personal protective equipment donning. The area will be set up with emergency eye wash equipment, first aid kits, and PPE and Hazcat disposal bins for operational wastes.
3. Tanks will be screened during preliminary air monitoring operations and approached with direct reading instruments and appropriate personal protective equipment based on preliminary data. Tanks containing liquids or solids will be sampled and characterized based on available site data and laboratory analysis. Courses of actions with regard to cleaning, bulking, or waste disposal will be made based on the recovered data. Tanks that are found to be product free and vapor free will be tagged with an out of service date and inventory number. Tanks designated as waste will be disposed of to Ecology Control Industries (ECI) in Richmond, California.
4. Mercury containing lamps categorized as waste will be packed and shipped for disposal to a light tube recycling facility (likely AERC Hayward, CA). Mercury containing switch gear appeared to be in a marketable condition based on preliminary review. If the switch gear or other articles containing mercury are found to be waste, they will be packaged in DOT approved containers and will be disposed of to a certified disposal facility as hazardous waste.
5. Contents of compressed gas cylinders will be determined by labels, content designations stamps or markings, and sample recovery and submission for analysis if necessary. Preliminary information from the client has indicated that the majority of the large stainless steel cylinders were recovered for scrap value. If the containers are pressurized the materials have historically been marketable or returnable to a manufacturer. Cylinders that cannot be maintained for market value, scrapped, or returned to the manufacturer may be disposed of as a waste material. Cylinder storage areas have been identified at the West end of the property in corrugated shed structures that are equipped with bays and tubs for vertical cylinder storage and segregation. Additional racks can be made available by the client for restraint and segregation. Applicable placards and labeling for the tubs and shed structures will have to be installed.
6. Assessment of containers and trailers was discussed and a basic containment procedure was described on Page 6, paragraph 11 titled "thirteen 40' trailers". This procedure called for the preliminary air monitoring to search for obvious flash or oxygen deficient hazards, and visual observation for leaking substances. Entry team protection will include the use of supplied air systems, flash and acid retardant wears, and the use of additional air monitoring equipment. Support teams will be performing containment operations before during and after the field operations.

7. Data Quality Objective Plans cannot be accurately or effectively constructed based on the available data at this juncture in the project. There is no written inventory or the majority of the site, there is no preliminary air data values from which assignments of responsibility and operational decision making can be derived in the DQO format that is not redundant to the H&S approach plan. There is no quantitative reference data available for the areas investigated and reviewed by EPA Personnel during previous visits to the site. The approach and investigative activities required to encompass these activities and derive this plan is outlined in the "Work Plan" and "Health and Safety Plan".
8. The "QAPP" is also without basic data from which a framework of Quality Assurance Goals can be established. Effective use of preliminary air data can be utilized to establish this plan.

5.0 Disposal Operations:

1. Romic Environmental Technologies
2081 Bay Road
Palo Alto, CA 94303-1316
Kurt Soto-CS
650-462-2422
CAD009452657
2. Demenno Kerdoon
2000 N. Alameda Street
Compton, CA 94218
Joyce DeHeart-CS
310-537-7100
CAT080013352
3. DK Environmental (DKE)
3650 E 26th Street
Vernon, CA 90023
Chandra Kreidt-CS
323-268-5056
CAT080033681
4. American Environmental Recycling Corporation (AERC)
30677 Huntwood Avenue
Hayward, CA 94544
Trinda Smith
510-429-1129
(Universal Wastes Only)

These facilities can receive the hazardous or universal wastes expected to be encountered at this location. These facilities are part of MESI operations and

permit status and certificates of insurance are maintained on file for submissions for State contracts.

6.0 EPA Comments:

1. Subcontractors are scheduled to equipment and materials suppliers only at this time. If operational changes occur that subcontracted services are required, MESI will furnish insurance and qualifying certifications for named subcontractors.
 2. After initial authorization to proceed from client with EPA clearance, MESI will mobilize and organize site operations for three days. Site orientation one full day. Health and Safety and Operational control implementation one full day, begin first field operations on the paint room approximately four days subsequent sampling, analytical turnaround, and clearance for disposal TBA. Next scheduled site location will be multi team operations. Two groups of three or more based on demands. Remainder of field activities time lines are subsequent to commodity vs. waste issues, air monitoring, levels of personal protection required upon approach and discovery and findings.
- No subcontractor personnel are currently scheduled to be onsite at this time.

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for partially scanned image(s)

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